

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon.
	:	
v.	:	Crim. No. 24-
	:	
DION MARSH	:	<u>Counts 1 - 5</u>
	:	18 U.S.C. § 249(a)(1)
	:	(Hate Crimes Prevention Act)
	:	
	:	<u>Count 6</u>
	:	18 U.S.C. § 2119(1)
	:	(Carjacking)

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

Background

1. At all relevant times, defendant DION MARSH was a resident of Manchester, New Jersey.

2. On or about April 8, 2022, MARSH carried out a series of violent assaults on members of the Orthodox Jewish Community in or around the area of Lakewood, New Jersey. Each of MARSH's victims were attired in traditional garments worn by members of the Orthodox Jewish community. MARSH assaulted each of these victims because they were visibly identifiable Orthodox Jews.

3. At approximately 1:18 p.m., in Lakewood, New Jersey, MARSH forced a visibly identifiable Orthodox Jewish man (Victim 1) out of his car by physically striking Victim 1. MARSH took control of Victim 1's car, which was manufactured

outside New Jersey, and drove it away. MARSH's violent assault caused injuries to Victim 1, including a black eye and a wound that required stitches.

4. At approximately 5:20 p.m., MARSH, driving a different car, used the car to deliberately strike another visibly identifiable Orthodox Jewish man (Victim 2) who was walking in or around Lakewood. MARSH's assault on and attempt to kill Victim 2 using a car caused Victim 2 to suffer an abrasion and pain.

5. At approximately 6:06 p.m., MARSH, still driving the car he used to hit Victim 2, used the car to deliberately strike another visibly identifiable Orthodox Jewish man (Victim 3) who was walking in or around Lakewood. MARSH's assault on and attempt to kill Victim 3 using a car caused Victim 3 to suffer several broken bones.

6. At approximately 6:55 p.m., MARSH, again driving the car he stole from Victim 1, used it to deliberately strike another visibly identifiable Orthodox Jewish man who was walking in Lakewood (Victim 4). After hitting Victim 4 with the stolen car, MARSH got out of the car and stabbed Victim 4 in the chest with a knife. MARSH's assault on and attempt to kill Victim 4 caused Victim 4 to suffer a stab wound and other injuries.

7. At approximately 8:23 p.m., MARSH, still driving the car he stole from Victim 1, used it to deliberately strike another visibly identifiable Orthodox Jewish man who was walking in Jackson Township, New Jersey (Victim 5). MARSH's assault on and attempt to kill Victim 5 caused Victim 5 to suffer several broken bones and internal injuries.

Count 1

(Hate Crimes Prevention Act)

8. Paragraphs 1 thru 7 are incorporated here.

9. On or about April 8, 2022, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

DION MARSH,

willfully caused bodily injury to Victim 1 because of Victim 1's actual and perceived race and religion.

In violation of Title 18, United States Code, Section 249(a)(1).

Counts 2 - 5

(Hate Crimes Prevention Act)

10. Paragraphs 1 thru 7 are incorporated here.

11. On or about April 8, 2022, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

DION MARSH,

willfully caused bodily injury to Victims 2 - 5 listed below, and through the use of dangerous weapons, attempted to cause bodily injury to Victims 2 - 5 listed below, because of each victim's actual or perceived race and religion. Each offense included an attempt to kill.

Count	Victim	Form of Assault
2	Victim 2	Strike with a Car
3	Victim 3	Strike with a Car
4	Victim 4	Strike with a Car and Stab with a Knife
5	Victim 5	Strike with Car

In violation of Title 18, United States Code, Section 249(a)(1).

COUNT 6

(Carjacking)

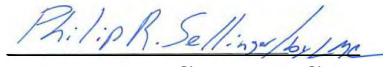
12. Paragraphs 1 through 3 are incorporated here.

13. On or about April 8, 2022, in Ocean County, in the District of New Jersey, and elsewhere, the defendant,

DION MARSH,

with the intent to cause serious bodily harm to Victim 1, did knowingly take a motor vehicle that had moved in interstate and foreign commerce from Victim 1 by force, violence, and intimidation.

In violation of Title 18, United States Code, Section 2119(1).


PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: _____

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v.

DION MARSH

INFORMATION FOR

**18 U.S.C. § 249(a)(1)
18 U.S.C. § 2119(1)**

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